

UNITED STATES DISTRICT COURT

for

Middle District of Pennsylvania/Harrisburg

Petition for Warrant or Summons for Offender Under Supervision

Name of Offender: Anupam Dass Case Number: 1:CR-00-339
Name of Sentencing Judicial Officer: The Honorable Yvette Kape
Date of Original Sentence: July 20, 2001
Original Offense: Mail Fraud, 18 USC § 1341
Original Sentence: 16 months imprisonment, 3 years supervised release
Type of Supervision: Supervised Release Date Supervision Commenced: October 25, 2002
Assistant U.S. Attorney: Martin Carlson Defense Attorney: Thomas Thornton

PETITIONING THE COURT

[] To issue a warrant

[X] To issue a summons for Mr. Dass to appear for a violation hearing before the Court for the defendant to show cause why his supervised release should not be revoked.

The probation officer believes that the defendant has violated the following condition(s) of probation:

<u>Violation Number</u>	<u>Nature of Noncompliance</u>
Standard Condition #2 and	"You shall submit a truthful and complete written report within the first five days of each month."
Standard Condition #6	"You shall notify the probation officer ten days prior to any change in residence or employment."

Since June 2003, Mr. Dass has provided Monthly Supervision Reports and pay stubs reflecting his employment at Baymont Inn, Harrisburg, Pennsylvania. On January 12, 2005, the probation officer developed information through the hotel manager that Mr. Dass was no longer employed with Baymont Inn and that he had been terminated on July 21, 2003. On January 13, 2005, the hotel manager reviewed copies of the pay stubs that Mr. Dass had been submitting to the probation officer and confirmed that the pay stubs were fictitious and not provided by their company.

On January 18, 2005, during a meeting with the probation officer, Mr. Dass admitted that for the past 18 months, he has provided false information on his Monthly Supervision Reports and fictitious documentation regarding his employment. He explained that he did not want the probation officer to know about his current employer because he did not want to risk the employer finding out about his criminal history. Further, he admitted that he has worked for the past year at Bookspan and since May 2004, at The Vitamin Shoppe. Mr. Dass failed to truthfully report this information as required on his Monthly Supervision Reports, and he failed to notify the probation officer of changes in his employment circumstances.

Standard Condition
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"The defendant shall not incur new credit charges or open additional lines of credit without approval of the probation officer....."

On December 02, 2004, Chhanda Dass provided a sworn statement to U.S. Postal Inspector W.B. Burnmeister alleging that her son, Anupam Dass, used her social security number to open a credit card account with Bank of America. In her statement, Chhanda Dass reported that her son used the credit card to purchase airline tickets to travel to Ohio. Further, she alleges that he made several purchases while in Ohio and numerous other purchases in Pennsylvania. The credit card now has a balance of over \$4,500. This matter is under investigation with the U.S. Postal Inspection Service and the U.S. Attorney's Office.

U.S. Probation Officer Recommendation:

☒ The term of supervision should be

☒ revoked.

☐ extended for _____ years, for a total term of _____ years.

☒ The issuance of a summons.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2005
Fh Steele
Fonda L. Steele
U.S. Probation Officer

THE COURT ORDERS:

☐ No Action

☐ The Issuance of a Warrant.

☒ The Issuance of a Summons.

☐ Other

[Signature]
Signature of Judicial Officer
1/24/05
Date